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Filing date: **10/16/2017**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91233869
Party	Defendant Plus Relocation Services, Inc.
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Date	10/16/2017
Attachments	ELOanswer.pdf(117982 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Applicant: Plus Relocation Services, Inc.

Serial No.: 87/040,041

Filing Date: May 18, 2016

Mark: ELO & Design

Published: October 11, 2016

Elo Touch Solutions, Inc., Opposer,

v.

Plus Relocation Services, Inc., Applicant.

Opposition No. 91233869

**APPLICANT'S ANSWER AND AFFIRMATIVE
DEFENSES TO NOTICE OF OPPOSITION**

The Applicant Plus Relocation Services, Inc., submits this Answer to the Notice of Opposition submitted by Opposer Elo Touch Solutions, Inc. Except as expressly admitted below, Applicant denies all allegations contained in the Notice of Opposition.

1. In response to paragraph 1, Applicant admits only that Opposer filed this proceeding but denies all remaining allegations.
2. Applicant is without sufficient information to admit or deny the allegations in paragraph 2, and therefore denies them.
3. Applicant is without sufficient information to admit or deny the allegations in paragraph 3, and therefore denies them.

4. Applicant admits the allegations contained in paragraph 4.
5. Applicant is without sufficient information to admit or deny the Opposer's allegations in paragraph 5, and therefore denies them.
6. Applicant admits the allegations in paragraph 6.
7. Applicant is without sufficient information to admit or deny the Opposer's allegations in paragraph 7, and therefore denies them
8. Applicant admits the allegations in paragraph 8.
9. Applicant admits the allegations in paragraph 9.
10. Applicant denies the allegations in paragraph 10.
11. Applicant admits the allegations in paragraph 11.
12. Applicant denies the allegations in paragraph 12.
13. Applicant denies the allegations in paragraph 13.
14. Applicant denies the allegations in paragraph 14.
15. Applicant denies the allegations in paragraph 15.

AFFIRMATIVE DEFENSES

1. Opposer's Notice of Opposition fails to state a claim upon which relief may be granted.
2. Registration of the Applicant's mark would cause no damage or injury to Opposer.
3. Applicant reserves the right to rely on all matters constituting an avoidance or affirmative defense to the extent that such defenses are supported by information developed through discovery or by evidence during testimony or at trial.

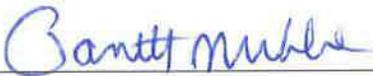
WHEREFORE, Applicant requests that Opposer's Notice of Opposition be dismissed, the Application be approved, and that Registration be issued.

This Answer is being filed electronically pursuant to ESTTA system.

Respectfully submitted,

PLUS RELOCATION SERVICES, INC.

Date: October 16, 2017

By: 

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Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon Opposer's counsel listed below by email on this date.

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